

**STATE OF ILLINOIS
SECRETARY OF STATE
SECURITIES DEPARTMENT**

In Re: Ajinder Sandhu and US Business Brokers, Inc.

File No. 1200093

NOTICE OF HEARING

TO RESPONDENTS: Ajinder Sandhu, President
9 Forsythia Court
Bolingbrook, IL 60490

US Business Brokers, Inc.
Ajinder Sandhu, President
101 West 22nd Street Suite 111
Lombard, IL 60148

You are hereby notified that pursuant to Section 10-40 of The Illinois Business Brokers Act of 1995, as amended, Ch. 815 ILCS 307/10-1, et seq. (the "Act") and 14 Ill. Adm. Code 130, Subpart K, a public hearing will be held at 69 West Washington Street, Suite 1220, Chicago, Illinois 60602, on the 10th day of June 2015, at the hour of 10:30 a.m., or as soon thereafter as counsel may be heard, before James L. Kopecky, or another duly designated Hearing Officer of the Secretary of State. A copy of the Rules under the Act pertaining to contested cases is attached to this Notice.

Said hearing will be held to determine whether a permanent Order of Prohibition should be entered against Ajinder Sandhu and US Business Brokers, Inc ("Respondents"), and/or granting such other relief as may be authorized under the Act including, but not limited to, censure and the imposition of a monetary fine in the maximum amount of \$10,000 per violation, payable within ten (10) business days of the entry of the Order.

The grounds for such proposed action are as follows:

1. Respondent, Ajinder Sandhu (hereinafter "Sandhu," or collectively with Respondent US Business Brokers, Inc. "Respondents") has a last known address of 101 Royce Road Suite # 3 Bolingbrook, IL 60440. Sandhu is president of US Business Brokers, Inc. and conducts his brokerage business through that company.

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2. Respondent, US Business Brokers, Inc. (hereinafter "US Business Brokers" or collectively with Respondent Ajinder Sandhu "Respondents") has a last known address of 101 Royce Road Suite # 3 Bolingbrook, IL 60440.
3. Respondent Sandhu was registered in the State of Illinois under the Illinois Business Brokers Act of 1995 (the "ACT") during all relevant times.
4. Respondent US Business Brokers is registered in the State of Illinois under the Illinois Business Brokers Act of 1995 (the "ACT") during all relevant times.
5. Investor A is an Illinois Resident.
6. Investor A entered into an "Exclusive Buyer Representative Contract" with Respondents.
7. Investor A remitted to Respondents a cashier's check in the amount \$15,000 in connection with the purchase of a gas station in December of 2010.
8. Although no contract was executed regarding the gas station referenced above, the earnest money was not returned to Investor A as of the date of this Notice of Hearing.
9. That Respondents are business brokers as that term is defined pursuant to Section 10-5.10 of the Illinois Business Brokers Act of 1995 [315 ILCS 307/10-1 et seq.] (the "Business Brokers Act").
10. That pursuant to Section 10-45 of the Business Brokers Act the Secretary of State issued a subpoena to Ajinder Sandhu for a deposition in the investigation of a complaint against him
11. That the subpoena was served on Respondent Sandhu on July 23, 2014 for his deposition on August 7, 2014. Although Sandhu contacted the Department on or about July 31, 2014 regarding the subpoena he had received he failed to appear on August 7, 2014 for the deposition as required. He had not requested a continuance.
12. That Section 10-85(a)(3) states that a business broker shall not, in connection with a contract for the services of a business broker, either directly or indirectly, "Engage in any act, practice or course of business that operates or would operate as a fraud or deceit upon any person."
13. That Section 10-85(b)(2) of the Business Brokers Act states that a business broker shall not "Fail to file with the Secretary of State any application, report, document, or answer required to be filed under the provisions of this Act or any rule made by the Secretary of State pursuant to this Act or to fail to comply with the terms of any order issued pursuant to this Act or rule made by the Secretary of State."
14. That by virtue of the foregoing, Respondents have violated Sections 10-85(a)(3) and 10-85(b)(2) of the Business Brokers Act.

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15. That Section 10-55(a) of the Business Brokers Act states that "If the Secretary of State determines, after notice and opportunity for a hearing, that a person has violated this Act, the Secretary of State may in addition to all other remedies, impose an administrative fine upon the person in an amount not to exceed \$10,000 for each violation."
16. That Section 10-55(c) of the Business Brokers Act states that "If the Secretary of State shall find that any person has violated any provision of this Act, the Secretary of State may, by written order temporarily or permanently prohibit or suspend such person from acting as a business broker."

You are further notified that you are required pursuant to Section 130.1104 of the Rules and Regulations (14 Ill. Adm. Code 130) (the "Rules"), to file an answer to the allegations outlined above within thirty (30) days of the receipt of this notice. A failure to file an answer within the prescribed time shall be construed as an admission of the allegations contained in the Notice of Hearing.

Furthermore, you may be represented by legal counsel; may present evidence; may cross-examine witnesses and otherwise participate. A failure to so appear shall constitute default, unless any Respondent has upon due notice moved for and obtained a continuance.

Delivery of notice to the designated representative of any Respondent constitutes service upon such Respondent.

Dated: This 30th day of April 2015


JESSE WHITE
Secretary of State
State of Illinois

Attorney for the Secretary of State:

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